
From: Jeremy Freimund [mailto:JeremyF@lummi-nsn.gov]

Posted At: Wednesday, May 17, 2006 4:57 PM

Posted To: Western Comments

Conversation: Comments on the Western Washington Phase II Storm Water Draft Permit

Subject: Comments on the Western Washington Phase II Storm Water Draft Permit

Please address the following comments regarding the Western Washington Phase II Storm Water Draft Permit:

1. Because the City of Ferndale and Whatcom County are listed (see Section S1.D.3.a.) as operators, please revise Appendix 2 of the permit to add the Nooksack River Watershed Bacteria Total Maximum Daily Load.
2. Section III.A.5 of the Detailed Implementation Plan for the Nooksack River Watershed Bacteria Total Maximum Daily Load (Ecology Publication No. 01-10-060) identifies a number of storm water requirements - many of which are already addressed in the draft permit. However, the following two bulleted items do not appear to be reflected in the draft permit:
 - a) The first bullet, "Incorporation of storm water management into growth management planning". Please add a permit condition in the revised Appendix 2 that states that capital improvement plans need to address any existing system deficiencies to bring the existing system up to current standards.
 - b) The last bullet, "Monitoring of implementation, conditions, budget needs and resources, and environmental trends over time", specifically the monitoring of conditions and environmental trends does not appear to be fully reflected in the draft permit conditions. Please add a permit condition in the revised Appendix 2 that states that a program to characterize storm water quality must be developed and implemented utilizing appropriate quality assurance and quality control practices.
3. Pursuant to the Final Rule for the National Pollutant Discharge Elimination System Permit Application Regulations for Storm Water Discharge (Federal Register dated November 16, 1990 (Vol. 55, No. 222), "storm water" should appear as two words (see Page 47997).

Thank you for addressing these comments.

Kind Regards,
Jeremy

Jeremy R. Freimund, P.H.
Water Resources Manager
Lummi Natural Resources Department
2616 Kwina Road
Bellingham, WA 98226-9298
jeremyf@lummi-nsn.gov

(tel) 360-384-2212
(fax) 360-384-4737